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February 9, 2012

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: MB Docket No. 11-189

As scholars active in communications policy and research, we write in support of the Commission's consideration of a proposal to replace broadcast television stations outdated quarterly issues/programs list with a standardized form that will provide specific and consistent data across broadcast TV stations and media markets (Docket 11-189). Access to this improved information will enable the public to better assess how broadcasters are claiming to serve the communities to which they are licensed. Additionally, making such data available in an electronic, standardized, and searchable format will allow researchers to produce analyses that will better inform Commission decision making and communications policy. This is a vitally important consideration given the extent to which the Commission regularly requests and relies upon the analyses conducted by the academic community. In this regard, SEED does not view this initiative as simply an effort to subsidize the work of social scientists (as some commenters in this proceeding have argued), but rather an important tool for ensuring that the Commission has access to the highest quality data and research to guide its decisionmaking.

Federal agencies are under increasing demand to produce quality research and data to validate their policy decisions. As a consequence, agencies frequently are forced to purchase expensive data from outside sources. Because these third party data sources treat such information as proprietary, agencies must enter into licensing agreements to secure such data, which means that the public and outside researchers are often unable to review and ensure the validity of the statistics on which the FCC bases its decisions.

The existing issues/programming lists provide little utility for members of the public, the Commission, or media scholars. The lists do not provide sufficient, consistent, or relevant data on the amount or types of local programming that broadcasters air to serve local audiences. Nor do they usually provide any information about how broadcasters are using their multicast

capabilities. Conversely, the proposal under consideration by the Commission requires broadcasters to report on whether and how they utilize their digital multicast capabilities -- data that is otherwise unavailable to, or costly to obtain for, the public and the FCC.

The new improved data collection proposed by the FCC in the Notice of Inquiry will provide researchers inside and outside of the Commission with a statistically relevant snapshot of the types and amount of programming that broadcasters air in response to community needs. We urge you to move forward expeditiously with adopting and implementing this proposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Philip Napoli".

Philip M. Napoli  
Director, McGannon Center, on behalf of Scholars Endorsing Enhanced Disclosure

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